

## REMARKS

Applicants appreciate the detailed examination evidenced by the Office Action mailed November 17, 2004 (hereinafter "Office Action"). In response to the § 112 rejection of Claim 37, Applicants have amended Claim 37 to correct the antecedent basis errors noted by the Examiner. Applicants have also amended selected ones of the claims to further highlight patentable distinctions over the cited combination of U.S. Patent No. 5,983,369 to Bakoglu et al. (hereinafter "Bakoglu") and U.S. Patent No. 6,070,149 to Tavor et al. (hereinafter "Tavor"), which, alone or in combination, do not disclose or suggest navigation *in* a three-dimensional physical product presentation space *representative of a physical scene*. Reasons supporting patentability of the claims are discussed in detail below.

### **Independent Claims 1, 20, 23 and 37 are patentable over Bakoglu and Tavor**

Independent Claim 1 has been amended to recite:

A method of conducting a virtual product presentation, the method comprising:  
establishing voice communications between a sales representative at a first computer and a customer at a remote second computer coupled to the first computer;  
generating respective first and second displays of a three-dimensional physical product presentation space *representative of a physical scene* at respective ones of the first and second computers; and  
controlling navigation *in* the three-dimensional physical product presentation space at the second computer from the first computer.

Independent Claims 20, 23 and 37 have been similarly amended. These amendments clarify that the recited "three-dimensional product presentation space" is representative of a *physical scene*, such as a room, open-air market, industrial site or the like, and that the navigation occurs *in* such a space, *i.e.*, in the scene. *See Present Application*, p. 8. For example, the specification describes embodiments wherein a three-dimensional physical product presentation space is a room including such features as display panels, a theater area, demo setups of equipment, etc., around which a customer may be led by a sales representative at the controlling computer. *See Present Application*, FIGs. 8-11 and accompanying description thereof at pp. 12-14.

Neither of the cited references discloses or suggests "navigation in" such a "three dimensional physical product presentation space representative of a physical scene." For example, the cited passage at column 8, lines 43-56 of Bakoglu (see *Office Action*, p. 3)

describes controlling the display of certain information, *e.g.*, a tutorial, on a customer's computer, but does not disclose or suggest ***navigation in a three dimensional product presentation space representative of a physical scene*** as recited in the claims.

The cited Abstract of Tavor states that the system described therein "adds graphics, animation, 3D, movie clips, voice and other effects to make the session enjoyable for the customer," but does not disclose or suggest any navigation in a representation of physical scene. The cited passage at column 5, lines 5-17 of Tavor describes provision of a "virtual sales representative for interacting with a customer browsing a virtual store web site," but, as with the Abstract, does not disclose or suggest any navigation in a representation of a physical scene.

In light of the foregoing, Applicants submit that the cited combination of Bakoglu and Tavor does not disclose or suggest all of the recitations of independent Claims 1, 20, 23, and 37. For at least this reason, Applicants submit that independent Claims 1, 20, 23 and 37 are patentable over Bakoglu and Tavor.

#### **The dependent claims are patentable**

Applicants submit that the dependent claims are patentable at least by virtue of depending from various ones of the patentable independent Claims 1, 20, 23, and 37. Applicants further submit that several of the dependent claims are separately patentable.

For example, Claim 3, which stands rejected as obvious over Bakoglu and Tavor, recites "generating a representation of a product presentation room" and ". . . controlling navigation in the product presentation room at the second computer from the first computer."

In rejecting Claim 3, the Office Action asserts that FIG. 6 of Bakoglu discloses a "room" (*Office Action*, p. 5), but Applicants point out that the only representation of a physical scene in this figure is a picture 316 of a service representative, not a representation of a room and, moreover, FIG. 6 and the accompanying description thereof does not disclose or suggest ***navigation in such a room***. As Tavor does not supply these missing teachings, Applicants submit that Claim 3 is separately patentable over Bakoglu and Tavor. Applicants submit that Claims 22, 30 and 40 are separately patentable for at least similar reasons.

Claim 5 recites "authorizing access to the three-dimensional product presentation space." As noted above, neither Bakoglu nor Tavor disclose or suggest the recited three-

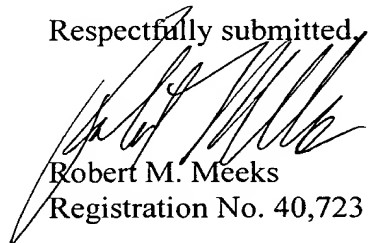
In re: Madarino et al.  
Serial No.: 09/963,745  
Filed: September 26, 2001  
Page 12 of 12

dimensional product presentation space. The passages from columns 13 and 14 of Bakoglu cited as teaching the recited authorization-related operations in Claim 5 (*see Office Action*, p. 6) have nothing to do with access to a three-dimensional product presentation space. Moreover, the cited FIG. 13 from Bakoglu cryptically refers to a step "Determine Access Rights," but further explanation of this operation appears to be absent from the text of Bakoglu. Accordingly, Applicants submit that the cited references do not disclose or suggest the recitations of Claim 5, and for at least this reason, Applicants submit that Claim 5 is separately patentable over the cited references. Similar reasons support the separate patentability of Claims 25 and 38.

### Conclusion

Applicant submits that the objections to and rejections of the claims are overcome for at least the reasons discussed above, and that the claims are, therefore, in condition for allowance, which is respectfully requested. Applicant encourages the Examiner to contact the undersigned by telephone to resolve any remaining issues.

Respectfully submitted,

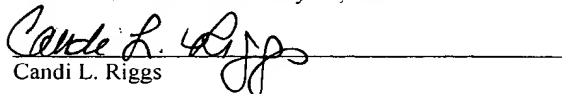


Robert M. Meeks  
Registration No. 40,723

**USPTO Customer No. 20792**  
Myers Bigel Sibley & Sajovec  
Post Office Box 37428  
Raleigh, North Carolina 27627  
Telephone: 919/854-1400  
Facsimile: 919/854-1401

### Certificate of Mailing under 37 CFR 1.8 (or 1.10)

I hereby certify that this correspondence is being deposited with the United States Postal Service with sufficient postage as first class mail in an envelope addressed to: Mail Stop Amendment, Commissioner for Patents, P.O. Box 1450, Alexandria, VA 22313-1450 on February 16, 2005.



Candi L. Riggs